

Salamander Quay, Uxbridge London UB9 6NZ

BNG Assessment

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1 Introduction

- 1.1 Plumb Associates Ltd was commissioned by Mountley Group to undertake an assessment of Salamander Quay, Uxbridge to determine whether it meets the criteria to be considered exempt from mandatory Biodiversity Net Gain.
- 1.2 The assessment has been undertaken by Steve Plumb MCIEEM CEnv CMLI, an ecologist with 40 years of professional experience.
- 1.3 Steve holds the Royal Geographical Society River Condition Assessment Certificate and is a qualified surveyor able to complete the RCA required for Biodiversity Net Gain calculations.

Site description

- 1.4 The existing office building is situated on a bend of the Grand Union Canal with two wings facing west and south over the canal. To the rear of the building is a car park that is currently fully surfaced.
- 1.5 Between the canal and building is predominantly sealed surfaces with small areas of ornamental shrubs along part of the banks. The plan below shows the site and the extent of the building and car park and the location of trees and ornamental shrubs.



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2 Biodiversity Net Gain Exemptions

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condition that the biodiversity gain objective is met (“the biodiversity gain condition”). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

- 2.4 One of the exceptions to mandatory BNG is for Development subject to the de minimis exemption.
- 2.5 The de minimis exemption only applies to development if the following two conditions are met:
 - the development must not impact on any onsite priority habitat; and
 - if there is an impact on other onsite habitat, that impact must be on less than 25 square metres (e.g. less than a 5m by 5m square) of onsite habitat with a biodiversity value greater than zero and on less than 5 metres of onsite linear habitat (such as a hedgerow or watercourse).
- 2.6 Habitat with biodiversity value of zero is primarily existing buildings or sealed or unsealed artificial surfaces.
- 2.7 Onsite habitat is impacted by the development if it is lost or degraded such that there is a decrease in the biodiversity value of that habitat (as determined by the statutory biodiversity metric). A decrease in biodiversity value occurs where there is a change in habitat type, extent, or condition which results in a negative unit score. A priority habitat is a habitat listed by the Secretary of State for Environment, Food and Rural Affairs under [section 41 of the Natural Environment and Rural Communities Act 2006](#).
- 2.8 An applicant, if they consider their development proposal to be within the scope of the de minimis exemption, must state in their planning application form that they consider the proposal to be subject to the de minimis exemption and provide reasons for this.
- 2.9 The purpose of this report is to justify why it is considered that this scheme meets the de minimis exemption criteria.

3 Priority Habitat

- 3.1 Canals are not included on the list of Priority Habitat as defined under section 41 of the Natural Environment and Rural Communities Act 2026. No other habitat within or adjacent to the site are Priority Habitat.
- 3.2 This means that the proposal meets the first criterion for de minimis exemption, in that it does not impact any priority habitat.

4 River Condition Assessment (RCA) methodology

- 4.1 An RCA can only be undertaken by a surveyor who has received training in the survey methodology and passed the assessments. They then receive the Royal Geographical Society River Condition Assessment Certificate and are deemed a qualified surveyor.
- 4.2 An RCA is undertaken using the standard MoRPh survey methodology. This requires a watercourse to be surveyed at least five points at set distances depending on the width of the watercourse. The survey records the condition of the bank top, bank face and channel margins and channel bed.
- 4.3 A River Type assessment is undertaken to determine the type of watercourse.
- 4.4 A Final Condition Assessment is calculated by inputting the results into RCA workspace on the Cartographer platform.
- 4.5 The Standard MoRPh River Survey recognises that the approach has limited suitability for Large and navigable rivers and canals, stating 'a reduced MoRPh survey is possible, focusing on the bank tops and faces and those bed features that are visible.' The Module length for these is 50m (the distance between survey points).
- 4.6 The riparian zone width for different watercourses is set out within the RCA and BNG guidance. The riparian zone width for canals is 10 metres from the top of each bank.
- 4.7 The riparian zone is defined as 'supporting features which influence the hydrological, geomorphological and biological functions or processes within the channel. It also provides the ecological function for riparian and aquatic species.' (BNG User Guide 2026)

5 Assessment of Salamander Quay

- 5.1 Below are a series of images of the canal and building which demonstrate the extent of the existing built form and hard landscaping and how they relate to the canal riparian zone and bank face.



Image 1

- 5.2 Image 1 is a view northward taken from the towpath on the opposite side of the canal with Salamander Quay to the right. This shows the limited extent of vegetation fronting the canal. All the ornamental planting between the building and the canal is to be retained.
- 5.3 Image 2 shows the whole western elevation of the building that is to be converted. There are windows along the entire length of the first floor of the building which face over the canal. There will be no increase therefore in level of light spill over the canal.
- 5.4 The existing balconies are visible in Images 2-4. These will be retained however it will be necessary to change the balustrades to ensure that they confirm to current Building Standards. This will not have any adverse impact on the light emission from the building.
- 5.5 Image 3 shows the southwest corner of the building and its relationship with the canal. There is hard landscape between the building and the canal. This is habitat with the distinctiveness value of zero. The bank face throughout this section is reinforced with metal sheet piles which have no ecological value. In this section there is no vegetation between the bank face and building.

5.6 It is possible to see the existing path between the bank top vegetation and building.



Image 2



Image 3



Image 4

- 5.7 Image 4 shows the view east along the southern elevation. There is a thin strip of vegetation along the top of the bank with a path separating it from the building. There is one small tree which is to be retained. There are existing windows the length of the first-floor elevation that are to be retained.
- 5.8 This Assessment confirms that most of the riparian zone associated with the site comprises surfaced paths, a habitat with a biodiversity value of zero. There is a total of 339 square metres of ornamental shrubs (which has a biodiversity value of 2) in two blocks. All of this is to be retained. The Existing Site Plan (Plan 1) shows the position of the existing planting.
- 5.9 It is not possible to carry a full River Condition Assessment of the canal and is recognised in the RCA survey forms due to the turbidity of the water and lack of visible features within the channel. The bank top (riparian zone) is predominately surfaced with a habitat distinctiveness value of zero. The only vegetation comprises ornamental planting beds, all of which is to be retained. The canal banks are reinforced with metal sheet piles which have no ecological value. It can be concluded that the proposal would not result in any degradation of onsite habitat such that there is a decrease in the biodiversity value of that habitat. This scheme therefore meets the criterion for de minimis exemption as there would be no adverse effects on areas of habitat of greater than 25sqm or linear habitat of greater than 5m.
- 5.10 The proposed landscape scheme indicates the removal of at least 200 square metres of sealed surface and replacement with new planting along the riparian zone. The proposed landscape strategy also includes new bird and bat boxes and living wall

panels. The landscape strategy would achieve an overall biodiversity net gain and be an enhancement to the riparian zone. The detail of the strategy can be secured by condition.

- 5.11 The effects of lighting do not form part of the River Condition Assessment. There is potential for changes in lighting to have an adverse effect on wildlife, particularly commuting and foraging bats. The proposal would not result in an increase in lighting above that which is associated with the existing building. The proposal would have no additional effect on protected species compared to the existing baseline. The LPA can impose an external lighting condition if they wished to control external lighting.

6 Conclusion

- 6.1 The proposal seeks to convert an existing office building to residential. The building is located beside the Grand Union Canal with sealed surfaces and small areas of ornamental planting within the riparian zone.
- 6.2 There is no priority habitat on site or adjacent to the site. The proposal would not result in any adverse impacts habitat with a distinctiveness value of greater than zero. The scheme therefore meets the criteria to be exempt from mandatory biodiversity net gain as it meets the relevant criteria.
- 6.3 The scheme would achieve biodiversity enhancements through the proposed new planting and installation of features such as bird and bat boxes.